## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: Whitnee Hibbler

Case No. 17 B 19989

Chapter 13

**DEBTOR** 

Judge Donald R. Cassling

### **NOTICE OF MOTION**

TO: See Attached Service List

PLEASE TAKE NOTICE that on <u>February 3, 2022, at 9:30 a.m.</u>, I will appear before the Honorable Donald R Cassling, or any judge sitting in that judge's place, and present the attached Motion, a copy of which is attached.

This motion will be presented and heard electronically using ZoomGov Meeting <a href="https://www.zoomgov.com">https://www.zoomgov.com</a>

Meeting ID: 161 414 7941

Passcode: 619

One tap mobile: +16692545252,,1614147941#,,,,,0#,,619# US (San Jose)

+16468287666,,1614147941#,,,,,0#,,619# US (New York)

No personal appearance in court is necessary or permitted.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Respectfully submitted,

By: <u>/s/ Angie S. Lee</u> Debtor's attorney

### CERTIFICATE OF SERVICE

I, Angie Lee, certify that I served a copy of this notice and the attached motion on each entity shown above at the address shown by ECF or First Class US Mail on or before January 17, 2022.

By: /s/ Angie Lee

Angie S Lee (III. #6282075) Lee Ratliff & Associates LLC PO Box 677 Flossmoor IL 60422 708-365-9937 angieleelaw900@gmail.com

Case 17-19989 Label Matrix for local noticing 0752-1 Case 17-19989

Northern District of Illinois Eastern Division

Mon Jan 17 10:10:12 CST 2022

Arnoldharris 111 West Jackson Suite 600

Chicago, IL 60604-3517

IRS PO Box 7346

Philadelphia, PA 19101-7346

(p) TIDEWATER FINANCE COMPANY P O BOX 13306

CHESAPEAKE VA 23325-0306

Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St

Room 873

Chicago, IL 60604-2027

Doc 81 Fileg U1/1/, L. Barkey Court 219 S Dearborn 7th Floor

Chicago, IL 60604-1702

City Of Chicago Department of Finance C/O Arnold Scott Harris P.C. 111 W Jackson Blvd Suite 600 Chicago, IL 60604-3517

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NAVIENT PC TRUST C/O Navient Solutions, LLC.

PO BOX 9640

Wilkes-Barre, PA 18773-9640

U.S. Dept of Education c/o Fed Loan Sevicing

Po Box 69184

Harrisburg, PA 17106-9184

Thomas H. Hooper

Office of the Chapter 13 Trustee 55 E. Monroe St., Suite 3850

Suite 3850

Chicago, IL 60603-5764

Entered 01/17/22 10:18:26 Desc Main Acs/loan Science

Acs/Education Services

Po Box 7051

Utica, NY 13504-7051

(p) CHICAGO DEPARTMENT OF LAW

ATTN BANKRUPTCY UNIT 121 N LASALLE ST SUITE 400 CHICAGO IL 60602-1264

National Collegiate Student Loan Trust 2004-

Po Box 4275

Norcross, GA 30091-4275

Angie S Lee

Lee Ratliff & Associates LLC

PO Box 677

Flossmoor, IL 60422-0677

Whitnee D Hibbler 4546 S Ellis Ave

#2S

Chicago, IL 60653-4997

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

City of Chicago Dept of Finance P.O. Box 88292 Chicago, IL 60680

Tidewater Finance Company PO Box 13306 Chesapeake, VA 23325

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Tidewater Finance Company

(u) Brandee Robinson

(u) James Hibbler

End of Label Matrix

Mailable recipients 14 Bypassed recipients 3

Total 17

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#### ATTORNEY'S MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR

NOW COMES the movant, Angie S. Lee d/b/a Lee Ratliff & Associates LLC, and pursuant to Local Rule 2091-1 files this Motion for Leave to Withdraw:

- 1. That Angie S. Lee (hereinafter "Attorney"), doing business as Lee Ratliff & Associates LLC, is licensed to practice law in the Northern District of Illinois and was so at all times and on all dates relative hereto.
- 2. That Attorney was retained to represent Whitnee Hibbler (hereinafter "Debtor") in the present matter.
  - 3. Attorney was paid by Debtor.
- 4. That Attorney has a pending full-time offer at a law office contingent that her practice is closed because she can no longer represent Debtor due to conflict of interest.
- 5. That Debtor has been provided a list of other attorneys should they wish to retain new counsel.

Wherefore, Movant Angie S. Lee of Lee Ratliff & Associates LLC prays that this Honorable Court grant leave for attorney Angie S. Lee of Lee Ratliff & Associates LLC to withdraw as attorney of record for Debtor and for further relief as this Honorable Court deems necessary and just.

Respectfully submitted,

<u>/s/ Angie S. Lee</u> Attorney for the Debtor

Angie S. Lee #6282075 Lee Ratliff & Associates LLC PO Box 677 Flossmoor IL 60422 708-365-9937